

**UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-1570 (GBD)(FM) ECF Case
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This document relates to:

*Ashton, et al. v. Al Qaeda Islamic Army, et al.* No. 02-CV-6977

*Burnett, et al. v. Al Baraka Investment & Development Corp., et al.*, No. 03-CV-5738

*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al.*, No. 04-CV-05970

*Federal Insurance Co, et al. v. Al Qaida, et al.*, No. 03-CV-6978

*Estate of O'Neill, et al. v. Al Baraka Investment and Development Corp., et al.*, No. 04-CV-1923

*Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279

**DEFENDANTS WORLD ASSEMBLY OF MUSLIM YOUTH SAUDI ARABIA AND**  
**WORLD ASSEMBLY OF MUSLIM YOUTH INTERNATIONAL RULE 26(a)(1)**  
**FOURTH SUPPLEMENTAL INITIAL DISCLOSURES**

Defendants World Assembly of Muslim Youth Saudi Arabia (“WAMY”) and World Assembly of Muslim Youth International (“WAMY International”), by and through their undersigned counsel, make the following supplemental initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1). These supplemental initial disclosures are based on information reasonably available to Defendants as of the date hereof. The disclosures herein are provided without prejudice to the rights of Defendants to identify additional witnesses or evidence. Further, Defendants reserve the right to supplement these initial disclosures.

**Individuals Who May Have Relevant Discoverable Information**

Defendants identify the following individuals who may have relevant discoverable information:

1. Saleh Al-Wohaibi. Secretary General of WAMY, 2002 to present.  
Address: Can be reached through undersigned counsel  
Subjects of information: WAMY history, policies and procedures.
2. Dr. Tawfeeq ibn Ahmed al Qusayyer. Former Secretary General of WAMY, 1981-1986.  
Address: Unknown  
Subjects of information: WAMY history, policies and procedures.
3. Dr. Ahmad Abdul Qadir Bahafidhallah. Former Secretary General of WAMY, 1978-1981.  
Address: Unknown.  
Subjects of information: WAMY history, policies and procedures.
4. Ibrahim Abdullah. Former Volunteer/Director, WAMY International, 1999-2004.  
Address: Jeddah, Saudi Arabia  
Subjects of information: WAMY International operations and WAMY Canada.
5. Majid Entebbe. Formerly involved with Lajnat El Birr Islamia (LBI).  
Address: Can be reached through undersigned counsel  
Subject of information: LBI
6. Ibrahim Anwar. Director WAMY Pakistan.  
Address: Can be reached through undersigned counsel  
Subject of information: WAMY Pakistan.
7. Dr. Abulwahab Noorwali. Former LBI Board member and former WAMY Assistant General Secretary.  
Address: Can be reached through undersigned counsel

Subjects of information: WAMY Jeddah and international operations, LBI.

8. Shahir Batterjee. Original board member of LBI.

Address: Jeddah, Saudi Arabia

Subjects of information: LBI.

9. Rustam Shah Mahmand. Former Minister of Pakistan.

Address: Pakistan

Subjects of information: WAMY activities in Pakistan.

10. Talha Al Jarad. Former Volunteer/Director, WAMY Canada.

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY Canada.

11. Mohamed Mustafa Mohamed. Former Director WAMY Pakistan.

Address: Sudan

Subjects of information: WAMY operations in Pakistan.

12. Ahmed Tutonji. Co-founder of WAMY

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY history.

13. Mustafa Osman Ismail. Chairman of Board of Trustees, Khartoum University, former Secretary of State of Sudan.

Address Khartoum, Sudan

Subjects of information: WAMY youth operations in Europe, former student of WAMY.

14. Adel Hamad. Former employee of WAMY Pakistan.

Address: Sudan

Subjects of information: low level employee of WAMY with knowledge on plaintiffs' allegation about his activities and actions in Pakistan.

15. Mohamed Khatib. Former Volunteer/Director, WAMY Canada.

Address: Canada

Subjects of information: WAMY Canada.

16. Nouredine Miladi. Former Volunteer/Director, WAMY United Kingdom

Address: Qatar

Subjects of information: WAMY United Kingdom.

17. Ziaul Haq Amarkhil. Chairman, National Stability Society. Former student at WAMY School in Peshawar, Pakistan 1999-2001.

Address: Kabul, Afghanistan

Subjects of information: WAMY programs in Pakistan and Afghanistan.

18. Ibrahim El Zayat. Former director of WAMY, Europe operations,

Address: Germany

Subjects of information: WAMY Western Europe operations.

19. Enaam Arnaout. Former Director of Benevolent International Foundation and Benevolent International Committee.

Address: Chicago, Illinois

Subjects of information: Benevolent International Foundation and Benevolent International Committee.

20. Colonel Lawrence Wilkerson. United States Army

Address: Virginia, USA

Subjects of information: Wrongful detention of Adel Hamad.

21. Abdullah Gul. Former President of Turkey.

Address: Istanbul, Turkey

Subjects of information: WAMY operations, youth activities and programs.

22. Babiker Mahdi Khojali. WAMY's Internal Auditor.

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY financial records and book keeping practice.

23. Muhammed Abdul-Hamid. WAMY's External Auditor

Address: Riyadh, Saudi Arabia

Subjects of information: WAMY financial records and book keeping practice.

27. Shahzada Shaed. Member of Parliament Afghanistan.

Address: Afghanistan

Subjects of information: WAMY programs and projects in Afghanistan.

28. Rooh Ullah Madani. Former minister of Awqaf and Islamic Affairs, Sarhad Pakhtunkwa, Pakistan, and Board of Trustee member at WAMY's school in Peshawar, Pakistan.

Address: Peshawar, Pakistan

Subjects of information: WAMY programs and projects in Pakistan.

29. Assadullah Sahil. Senior Program Officer at United States Institute of Peace, and graduate of WAMY's school in Peshawar, Pakistan.

Address: Afghanistan

Subjects of information: WAMY programs in Pakistan and Afghanistan.

30. Fida Mohammad Awab. Senior employee at WAMY Pakistan office.

Address: Pakistan

Subjects of information: WAMY programs in Pakistan and Afghanistan.

31. Anwar Hajjaj. Volunteer WAMY International

Address: USA

Subject of information: WAMY International operations

32. Mohammad Al-Juhani. Former Executive at Saudi Arabia Monetary Agency

Address: Riyadh, Saudi Arabia

Subject of information: WAMY's compliance with Saudi Arabian Monetary Agency rules and regulations.

33. Dr. Najibullah Zalmai. Former Doctor at a WAMY hospital in Pakistan

Address: Afghanistan

Subject of information: WAMY's programs and projects in Afghanistan.

34. Dr. Mohamad Sharif Sailani. Former Doctor at a WAMY hospital in Pakistan

Address: Afghanistan

Subject of information: WAMY's programs and projects in Afghanistan.

35. Ahmed Mohammad Ajaj

Address: Florence, Colorado

Subject of Information: Envelope in his possession on September 1, 1992

36. Ayman Khayaht. Field director of LBI.

Address: Jeddah, Saudi Arabia

Subject of information: Has information concerning LBI's benevolent work in Pakistan.

37. Lamia Khalifa. Director of WAMY's female section in Jeddah.

Address: Jeddah, Saudi Arabia

Subject of information: Has information concerning WAMY's refugee work in Chechnya.

March 9, 2018

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